

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Nelson Knitting - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #3
Progress
Nelson Knitting
C5RT
Rockford, IL
Latitude: 42.2638342 Longitude: -89.1018692

To: Sam Borries, U.S. EPA
Mike Ribordy, U.S. EPA
Jerry Willman, Illinois EPA
Robert Wilhelm, City of Rockford
Eric Setter, Winnebago County

From: Robert Kondreck & Colin Hendrickson, On-Scene Coordinators

Date: 3/3/2023

Reporting Period: 2/20/2023 - 3/3/2023

1. Introduction

1.1 Background

Site Number:	C5RT	Contract Number:	
D.O. Number:		Action Memo Date:	11/30/2022
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	1/30/2023	Start Date:	1/30/2023
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

CERCLA Incident Category: Inactive Production Facility

1.1.2 Site Description

The former Nelson Knitting Site is located in Rockford, Winnebago County, Illinois. The Site formerly operated as a sock knitting mill from 1926 to 1990 and then was mostly unused from 1990 to present. The current owner of the Site is Winnebago County who purchased the property through tax delinquency on October 17, 2022.

The Site consists of one parcel of land and is approximately 2 acres in size. The Site consists of a dilapidated three-story industrial building with a collapsing roof. The City of Rockford elected to condemn and secure the Site in June 2020; however, trespassers have continued to manage to enter the building. Site assessments by the city and EPA have found evidence of scrapped building materials and friable asbestos debris littered on the floor. Additionally, the Site contains PCB lighting ballasts, lead acid batteries, miscellaneous chemicals, mercury switches, and fluorescent light tubes.

1.1.2.1 Location

The Site is located at 909 S. Main Street, Rockford, Winnebago County, Illinois 61101. The geographic coordinates of the Site are 42.263834 North and -89.101958 West. The Site occupies approximately 2 acres in the southwestern portion of the city. The Site encompasses one parcel of land and is zoned for industrial use. The property is bordered to the north by a wooded lot owned by the Rockford Park District; to the east by an operating commercial warehouse and office space; to the south by an open lot; and to the west by the Tinker Swiss Cottage Museum Campus owned by the Rockford Park District. A residential neighborhood is located approximately 300 feet southwest of the Site. There is an elementary school 0.5 mile from the Site, public housing less than a quarter mile from the Site, and the Winnebago County jail 0.6 miles from the Site.

1.1.2.2 Description of Threat

A release or threat of release of hazardous substances, pollutants, or contaminants is present at the Site. Based on available data, the hazardous substances, as defined by Section 101(14) of CERCLA, present is primarily asbestos. Asbestos is designated as a hazardous substance under CERCLA at 40 C.F.R. § 302.4 and has been determined to be a human carcinogen by EPA. Other hazardous substances listed under 40 C.F.R. § 302.4, or pollutant or contaminants include PCB lighting ballasts, lead acid batteries, miscellaneous chemicals, mercury switches, and fluorescent light tubes. The presence of asbestos at the Site has been documented by the analysis of samples collected from asbestos thermal system insulation debris found on the floor. As the roof continues to slowly collapse, ACM debris will be increasingly vulnerable to weathering and further degradation. The Site has remained largely unsecured and is subject to frequent trespassing and vandalism. Trespassing individuals are exposed to the asbestos debris and can potentially transport the ACM outside of the Site.

Approximately 12,204 people live within one mile of the Site. An Environmental Justice (EJ) analysis was conducted for the Site. Screening of the surrounding area was performed using Region 5's EJ Screen Tool. Region 5 has reviewed environmental and demographic data for the area surrounding the Site at 909 S. Main St., Rockford, Winnebago County, Illinois and determined there are multiple variables above 80%.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On July 31, 2008, Fehr-Graham & Associates completed a Phase I Environmental Site Assessment that identified the following environmental risks at the Site: deteriorated suspect ACM pipe insulation, suspected lead-based paint on surfaces, containers of miscellaneous chemicals ranging in size from a few ounces to 55 gallons, mercury-containing fluorescent lamps, suspected PCB-containing fluorescent lamp ballasts and electrical capacitors.

On July 10, 2020, the IEPA referred Nelson Knitting to the EPA and requested an OSC be assigned to the Site to evaluate the Site for a time-critical removal action. Illinois EPA documented hazards at the Site, including suspect friable asbestos released to the environment, and did not believe the owner had sufficient financial resources to address the Site.

On October 8, 2020, an OSC and START contractors conducted a Site Assessment. Eleven ambient air samples (interior and exterior) and seven bulk samples were collected for ACM analysis. All eleven air samples were found to have concentrations below the Occupational Safety and Health (OSHA) Permissible Exposure Limit (PEL) of 0.1 fibers per cubic centimeters. Bulk samples from seven suspect ACMs were collected at the Site from four areas disturbed by recent activity in the building. Of the seven sampled building materials, three samples were identified as friable and tested positive to contain asbestos concentrations above one percent.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Reporting period for 2/20/2023 to 3/3/2023

2.1.2 Response Actions to Date

During this reporting period, the following activities took place:

-All PCB ballasts, fluorescent light tubes, mercury switches, and lead acid batteries are staged into DOT-approved containers and are awaiting transportation and disposal;

-Shipped 7 roll-off boxes of asbestos debris for disposal;

-Established two outdoor air monitoring and sampling stations at openings to the building. START is collecting data/samples daily as weather permits;

-Completed the removal and disposal of asbestos debris from the ground level.

Particulate Air Monitoring:

Background particulate monitoring and several background asbestos samples were collected prior to asbestos removal. Personnel asbestos air sampling was completed during asbestos debris removal per applicable OSHA regulations. Outdoor particulate monitoring and asbestos sampling was conducted when asbestos was being removed from the building.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The Site is currently owned by Winnebago County. Enforcement activities on PRPs are ongoing.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Fluorescent Light Tubes	Solid	~(300) 8-ft ~(200) 4-ft	TBD	N/A	Veolia
Lead Acid Battery	Solid	(4) Batteries	TBD	N/A	Veolia
Mercury Switches	Solid	(11) Switches	TBD	N/A	Veolia
Mercury Thermometer	Solid	(1) Thermometer	TBD	N/A	Veolia
PCB Light Ballasts	Solid	(2) 55-gallon Drums	TBD	N/A	Veolia
ACM Debris	Solid	(10) 20-cuyd roll-offs	TBD	N/A	Rock River Disposal

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

- Develop and implement a site Health and Safety Plan, a Site Emergency Contingency Plan, an Air Monitoring/Sampling Plan, and develop measures to control ACM dust during the removal;
- Develop and implement a Site Security Plan;
- Delineate the extent of all solid waste materials which may be found on Site; delineate and determine the extent of asbestos found on Site;
- Characterize and segregate, when possible, ACM waste from waste not containing ACM;
- Load, transport and dispose of ACM, identified hazardous substances, pollutants, ACM impacted wastes, or contaminants at an EPA-approved disposal facility in accordance with the EPA Off-site Rule (40 C.F.R. § 300.440);
- Take any other response actions to address any release or threatened release of a hazardous substance,

pollutant or contaminant listed in this Action Memo that the EPA OSC determines may pose an imminent and substantial endangerment to the public health or the environment.

2.2.1.2 Next Steps

PCB ballasts, fluorescent lighting tubes, mercury switches, and lead acid batteries are staged in DOT-approved containers and scheduled for transportation and disposal on 3/8/2023. Collection and disposal of asbestos debris was completed during this reporting period.

2.2.2 Issues

The interior of the Site has very minimal lighting. String lights have been placed in work zones but visibility can still remain an issue.

Freezing rain and cold temperatures has limited work on some days.

2.3 Logistics Section

The ERRS RM is performing site logistics.

2.4 Finance Section

2.4.1 Narrative

See table below for current budget information:

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$275,000.00	\$176,232.66	\$98,767.34	35.92%
TAT/START	\$35,000.00	\$32,400.00	\$2,600.00	7.43%
Intramural Costs				
Total Site Costs	\$310,000.00	\$208,632.66	\$101,367.34	32.70%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

EPA OSC will be serving as the Safety Officer.

2.5.2 Liaison Officer

Not applicable.

2.5.3 Information Officer

Macy Pressley will be serving as the PIO.

3. Participating Entities

3.1 Unified Command

Not applicable

3.2 Cooperating Agencies

Illinois Environmental Protection Agency

City of Rockford (Brownfields and Parks)

Winnebago County Trust

4. Personnel On Site

(5) ERRS (EQM) - 1.5 operator, 2.5 laborers, 1 RM

(1) START (Tetra Tech) - 1 primary START

(2) OSC

5. Definition of Terms

ACM - Asbestos Containing Materials

CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act

EJ - Environmental Justice

EPA - US Environmental Protection Agency

ERRS - Emergency and Rapid Response Service Contractor

IEPA - Illinois Environmental Protection Agency

NCP - National Contingency Plan

NPL - National Priorities List

OSC - On-Scene Coordinator

PCBs - Polychlorinated Biphenyls

PolRep - Pollution Report

PRP - Potentially Responsible Party

RM - Response Manager

START - Superfund Technical Assessment & Response Team

6. Additional sources of information

6.1 Internet location of additional information/report

response.epa.gov/nelsonknitting

6.2 Reporting Schedule

A final PolRep will be released once the waste is off-site. Waste is anticipated to be off-site on March 8, 2023.

7. Situational Reference Materials

No information available at this time.





